UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION

MDL NO. 2492

Master Docket No. 13-cv-09116

IN RE: NATIONAL COLLEGIATE ATHLETIC ASSOCIATION STUDENT-ATHLETE CONCUSSION LITIGATION

Judge John Z. Lee

Magistrate Judge Geraldine Soat Brown

DECLARATION OF STEVE W. BERMAN IN SUPPORT OF RENEWED MOTION TO ADD NON-CONTACT SPORTS PLAINTIFFS AND CLASS REPRESENTATIVES

- I, Steve W. Berman, declare as follows:
- 1. I am the Managing Partner of Hagens Berman Sobol Shapiro LLP and Co-Lead Counsel for the Plaintiffs in *In re: National Collegiate Athletic Association Student-Athlete Concussion Litigation*, No. 13-cv-09116 (N.D. Ill.). I have full knowledge of the matters stated herein, and could and would testify hereto if necessary.
- 2. Non-confidential documents are publicly filed as attachments beginning at Exhibit 1. Confidential documents are filed under seal as Exhibits 4-5.
 - 3. Attached are true and correct copies of the following documents:

Ex.	Bates Numbers
1	NCAA00007964-7966
2	NCAA00014606-09
3	NCAA00003483-91
4	NCAA00001639-45
5	NCAA00013786-98

I declare that the foregoing is true and correct to the best of my ability.

Date: December 15, 2014 Respectfully submitted,

By: /s/ Steve W. Berman
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CERTIFICATE OF SERVICE

The undersigned, an attorney, hereby certifies that on December 15, 2014, a true and correct copy of the foregoing was filed electronically via CM/ECF, which caused notice to be sent to all counsel of record.

By: /s/ Steve W. Berman